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McLean, VA 22102

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LNGS | LUKAS,
NACE,
GUTIERREZ
& SACHS, LLP

July 1, 2014

PUBLIC REFERENCE COPY

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SC: (703) 584-8670
JC: (703) 584-8686
dlafuria@fcclaw.com
schernoff@fcclaw.com
jclmko@fcclaw.com

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A306
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Secretary Dortch:

On behalf of Cellular South Licenses, LLC (SAC 259004) ("Cellular South"), please find attached a redacted public version of Cellular South's FCC Form 481 Carrier Annual Report, filed pursuant to Section 54.313 of the Commission's Rules ("Form 481 Report"). The Form 481 Report has been submitted to the Universal Service Administrative Company through its E-File System, and was successfully certified on July 1, 2014. The attached Form 481 Report has been marked "**REDACTED – FOR PUBLIC INSPECTION.**"

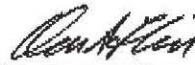
Cellular South is also submitting to the Commission, under separate cover, a confidential version of the Form 481 Report. The confidential version is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**"

Marlene H. Dortch
Secretary
Federal Communications Commission
July 1, 2014
Page 2

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Please contact the undersigned if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,



David A. LaFuria
Steven M. Chernoff
John Cimko

Attorneys for:
Cellular South Licenses, LLC

Attachment

REDACTED - FOR PUBLIC INSPECTION

Page 1

FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0066/OMB Control No. 3060-0019 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Stacey Lindley
<035> Contact Telephone Number: Number of the person identified in data line <030>	6019747609 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	slindley@csipire.com

ANNUAL REPORTING FOR ALL CARRIERS		SA 315 Completion Required	SA 427 Completion Required
		(check box when complete)	

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> -- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	REDACTED	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 259004a1510.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 259004a1610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(If yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 259004a11010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(If not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Page 1

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@csfire.com

<110> Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5	
<111> year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

259004a1100.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

✓
✓
✓
✓
✓
✓

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspsire.com

[illegible]

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspsire.com

[illegible]

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com

[illegible]

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com
<810>	Reporting Carrier	Cellular South Licenses, LLC
<811>	Holding Company	Telapex, Inc.
<812>	Operating Company	C Spire Wireless

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

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(1100) No Terrestrial Backhaul Reporting Data Collection Form		ECC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@csfire.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

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(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@csfire.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP http://www.csfire.com/company_info/about/programs/lifeline_assistance.jsp?_requestid=339185

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

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(2000) Price Cap Carrier Additional Documentation Data Collection Form Including Rate of Return Carriers affiliated with Price Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0619 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@cspsire.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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30001 Rate Of Return Carrier Additional Documentation		FCC Form 484
Data Collection Form		OMB Control No.: 3045-0065; OMB Control No.: 3045-0065
		July 2013

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6029747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspace.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒
(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☐ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐
(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐
(3023) Underlying information subjected to a review by an independent certified public accountant ☐
(3024) Underlying information subjected to an officer certification. ☐
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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Page 12

Certification - Reporting Carrier Data Collection Form	RCF Form 45 OMB Control No. 3040-0986/OMB Control No. 3040-0819 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licensee, LLC
<020> Program Year	2013
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: Cellular South Licensee, LLC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 07/01/2014
Printed name of Authorized Officer: Benjamin Pace	
Title or position of Authorized Officer: CPO	
Telephone number of Authorized Officer: 6019747151 ext.	
Study Area Code of Reporting Carrier: 259004	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Certification - Agent/Carrier Data Collection Form	FGC Form 18 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	259004
<015> Study Area Name	Cellular South Licenses, LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035> Contact Telephone Number - Number of person identified in data line <030>	5019747609 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Attachments

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Cellular South Licenses, LLC

SAC 259004

Form 481

Line 112 – Service Quality Improvement Reporting

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY
AS THE FILER HAS REQUESTED CONFIDENTIAL TREATMENT**

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**Cellular South Licenses, LLC
SAC 259004
Form 481
Line 220 – Outage Reporting Voice**

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY
AS THE FILER HAS REQUESTED CONFIDENTIAL TREATMENT**

REDACTED - FOR PUBLIC INSPECTION

**Cellular South Licenses, LLC
SAC 259004
Form 481
Line 510 – Service Quality Standards and
Consumer Protection Rules**

REDACTED - FOR PUBLIC INSPECTION

**Cellular South Licenses, LLC
SAC 259004 (Alabama)**

Form 481

Line 510 – Service Quality Standards and Consumer Protection Rules Compliance

Cellular South Licenses, LLC ("Cellular South"), follows service quality and consumer protection practices, in connection with its provision of voice services and broadband services, that ensure that Cellular South:

- (1) Discloses rates and terms of its voice services and broadband services to customers.
- (2) Makes available maps showing where voice services and broadband services are generally available.
- (3) Provides contract terms to customers and confirms changes in voice service or broadband service.
- (4) Allows a trial period for new voice service and broadband service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.
- (7) Provides customers the right to terminate voice service or broadband services for changes to contract terms.
- (8) Provides ready access to customer service.
- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of consumer privacy.
- (11) Provides consumers with free notifications for voice, data and messaging usage, and international roaming.

REDACTED - FOR PUBLIC INSPECTION

- (12) Abides by standards regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets that are locked by or at the direction of Cellular South.

These service quality and consumer protection practice categories are the same as those included in the CTIA–The Wireless Association® (“CTIA”) Consumer Code for Wireless Service (“CTIA Code” or “Code”) as currently in effect.¹

¹ Cellular South is not a member of CTIA, and therefore is not listed by CTIA as having implemented the provisions of the CTIA Code. Nonetheless, Cellular South’s service quality and consumer protection practices are identical to those prescribed in the CTIA Code. The CTIA Code can be viewed on the CTIA website at <http://www.ctia.org/policy-initiatives/voluntary-guidelines/consumer-code-for-wireless-service> (accessed June 3, 2014). The Code adopts “principles, disclosures and practices for wireless service, including voice, messaging and data services for postpaid or prepaid consumers.” *Id.*

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Cellular South Licenses, LLC

SAC 259004

Form 481

Line 610 – Network Functionality in Emergency Situations

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY
AS THE FILER HAS REQUESTED CONFIDENTIAL TREATMENT**

REDACTED - FOR PUBLIC INSPECTION

Cellular South Licenses, LLC

SAC 259004

Form 481

Line 700 – Price Offerings Including Voice Rate Data

(700) Price Offerings including Voice Rate Data
Data Collection Form
FCC Form 441
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@cspire.com

<701> Residential Local Service Charge Effective Date	2/1/2014
<702> Single State-wide Residential Local Service Charge	

<703>

[illegible]

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**Cellular South Licenses, LLC
SAC 259004
Form 481
Line 710 – Broadband Price Offerings**

Data Collection Form

EGC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	259004
<015>	Study Area Name	Cellular South Licenses, LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stacey Lindley
<035>	Contact Telephone Number - Number of person identified in data line <030>	6019747609 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	slindley@csfire.com

[illegible]

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**Cellular South Licenses, LLC
SAC 259004
Form 481
Line 813 – Operating Companies**

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY
AS THE FILER HAS REQUESTED CONFIDENTIAL TREATMENT**

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Cellular South Licenses, LLC

SAC 259004

Form 481

Line 1010 – Voice Services Rate Comparability

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Cellular South Licenses, LLC
SAC 259004 (Alabama)

Form 481

Line 1010 – Descriptive Document for Voice Services Rate Comparability

The Commission's rules require a recipient of high-cost support to certify that "the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau" 47 C.F.R. § 54.313(a)(1).¹ The Wireline Competition Bureau ("WCB") released a Public Notice on March 20, 2014, specifying the national average urban rate for voice service and indicating that "each ETC, including competitive ETCs, must certify that the pricing of the voice services is no more than \$46.96." Public Notice, DA 14-384 (rel. Mar. 20, 2014), at 2.

Cellular South Licenses, LLC ("Cellular South") currently offers voice services that are below the \$46.96 specified in the WCB Public Notice. Specifically, Cellular South offers a Home Phone Replacement Plan that provides unlimited home phone voice minutes and unlimited nationwide long distance minutes for a flat monthly charge of \$20.00. Given that the national average urban rate survey is based on local rate plans, an "apples-to-apples" comparison would derive a monthly charge for the local component of this Cellular South rate plan far below \$20.00. Accordingly, Cellular South's rate plan is well below the \$46.96 benchmark.

¹ In the *Further Notice*, the Commission sought comment on how to define the "basic offering" that a mobile wireless provider must report for voice rate comparability purposes. Specifically, the Commission asked how a mobile wireless "basic offering" should be defined in a way that "take[s] into account packages that offer varying numbers of minutes of usage and/or additional features such as texting[.]" *Connect America Fund Further Notice of Proposed Rulemaking*, WC Docket No. 10-90, *et al.*, 26 FCC Rcd 17663, 18046 (para. 1020). The Commission has not yet adopted a definition. In the absence of a definition of "basic offering" for purposes of the voice service rate comparability, Cellular South provides an analysis with respect to a rate plan that is arguably its most "basic" offering.